

1 Aaron Freedman (admitted *pro hac vice*)

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3 **WEITZ & LUXENBERG, PC**

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7 *Attorney for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 RACHELLE COLVIN, individually and as
12 next friend of minor Plaintiff, G.D., and
13 DANIELLE SASS, individually and as next
14 friend of minor plaintiff, L.C., and on behalf
15 of all others similarly situated,

16 Plaintiffs,

17 v.

18 ROBLOX CORPORATION, SATOZUKI
19 LIMITED B.V., STUDS
20 ENTERTAINMENT LTD., and RBLXWILD
21 ENTERTAINMENT LLC,

22 Defendants.

Civil Action No.: 3:23-cv-04146-VC

**DECLARATION OF AARON
FREEDMAN IN SUPPORT OF
REQUEST TO ENTER DEFAULT**

23 I, Aaron Freedman, declare as follows:

24 1. I am an attorney at the law firm Weitz & Luxenberg, P.C., and I represent Plaintiffs
25 in the above-captioned matter.

26 2. I have personal knowledge of all facts stated in this declaration.

27 3. The complaint in this matter was filed on August 15, 2023 (ECF No. 1), and the
28 summons was filed on August 16, 2023 (ECF No. 6).

1 Defendant Studs Entertainment LTD (“Studs”) was served with the complaint and
summons on January 26, 2024 (ECF No. 62) at its registered address in Cyprus, pursuant to Fed. R.

1 Civ. P. 4, Article 10 of the Hague Service Convention, and consistent with Cyprus' Rules of Civil
2 Procedure.

3 5. Service was accepted by Mr. Michael Chambers, an attorney who works at Studs
4 Entertainment LTD's registered address.

5 6. An answer to the complaint was due on February 16, 2024.

6 7. Defendant Studs has failed to appear, plead or otherwise defend within the time
7 allowed by the Federal Rules of Civil Procedure.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed on March
9 11, 2024, in New York, New York.

11 Respectfully submitted,

12 /s/ Aaron Freedman

13 Aaron Freedman (admitted *pro hac vice*)

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19 *Counsel for Plaintiff and the Proposed Class*